

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

EVDOKIA NIKOLOVA,
Plaintiff,

v.

UNIVERSITY OF TEXAS AT AUSTIN,
Defendant.

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Civil Action No.: 1:19-CV-00877

DEFENDANT’S RESPONSE TO PLAINTIFF’S MOTION IN LIMINE

In compliance with the Court’s Order dated January 27, 2022, and Rule CV-16(g)(3) of the Court’s Local Rules, LR CV-16(g) (W.D. Tex.), please find the response by Defendant The University of Texas at Austin (“UT Austin”) to the motion in limine filed by Plaintiff Evdokia Nikolova (“Nikolova”) (Dkt. #58-4). For all items to which UT Austin is unopposed, UT Austin reserves the right to revisit its determination and ask the Court to reconsider its ruling during trial (outside the presence and hearing of the jury).

#	PLAINTIFF’S MOTION	DEFENDANT’S RESPONSE
1.	Any mention or reference to any findings the EEOC’s “Right to Sue” dismissal letter. Dkt. #58-4, 3–4.	<ul style="list-style-type: none"> Unopposed.
2.	Any mention or reference to the work done by, occupation of, or income or net worth of Dr. Nikolova’s husband, Jimmy Horn. Dkt. #58-4, 4.	<ul style="list-style-type: none"> Unopposed as to “income or net worth.” Opposed as to “work done by” and “occupation of.” Dr. Nikolova’s husband worked with her professionally, assisted with the preparation of her tenure dossier, and appears (in that capacity) in both parties’ proposed exhibits. <i>E.g.</i> Def’s Exhs. 16–18, Pl’s Exh. 88.
3.	Any mention or reference to any tax filings by any party or witness in this case. Dkt. #58-4, 4.	<ul style="list-style-type: none"> Assuming this motion in limine does not include Nikolova’s W-2 forms (Pl’s Exhs. 205–10), unopposed.

#	PLAINTIFF'S MOTION	DEFENDANT'S RESPONSE
4.	Any mention or reference to the location or details of any travels or trips taken by Dr. Nikolova and her family during the pendency of this litigation. This item does not restrict any mention of the number or amount of any leaves taken during this period of time. Dkt. #58-4, 4.	<ul style="list-style-type: none"> Unopposed.
5.	Any mention or reference to claims that are no longer before the Court due to dismissal by the Court in its orders in this case or by action of the Plaintiff's pleadings. Dkt. #58-4, 5.	<ul style="list-style-type: none"> Unopposed.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 9, 2022, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Benjamin L. Dower
BENJAMIN L. DOWER
Deputy Chief for General Litigation Division